

in the list. If the line is known to be clean, then the reference is not in the list. From the specification, for example, page 4, lines 23-24, for each tag in the GOTL, the corresponding line may be dirty, or may be only potentially dirty (modifiable). For purposes of the present application, it does not matter whether the line is actually dirty, it only matters that the line may be dirty. In the office action, on page 4, the examiner states what is required for coherency (a line is either identical or not identical). That is not relevant to the claim, which deals with what is not known about the line, not the actual modified or unmodified status of the line. Presence of an entry in the list means that the system does not know (or care) whether the line is identical. If the system knows that the line is identical, then there is no entry in the list.

In the office action at page 4, the examiner interprets the claim as if the claim reads “for which a corresponding line in memory is not identical”. From MPEP 2173.05(a), the pending claims must be given the broadest interpretation consistent with the specification. The examiner’s interpretation is narrowing, is inconsistent with the plain English wording of the claim, and is inconsistent with the specification. The examiner refers to the specification at page 7, lines 3-14, specifically referring to line 14 in which for a MESI coherency protocol, items in the list have a state of “exclusive” or “modified”. The cited lines expressly support the applicant’s argument, and the examiner’s argument is inconsistent with the cited lines. A line in the “exclusive” state is not modified. It is inconsistent to interpret the claim as requiring that the corresponding lines in memory are not identical (the interpretation requires the lines referenced in the list to be modified).

In the office action at page 5, claim 4 is rejected under 35 U.S.C., second paragraph, as being indefinite, because of the phrase “substantially less”. Applicant traverses. MPEP 2173.05(b), expressly discussing the word “substantially”, cites *In re Mattison*, 509 F.2d 563, 184 USPQ 484 (CCPA 1975). In *In re Mattison*, the CCPA ruled that the phrase “to substantially increase” was definite. Claim 4 uses the word “substantially” in the same sense as in *In re Mattison*, to mean more than an insubstantial difference.

In the office action on page 6, claims 1, 2, 4 and 5 are rejected under 35 U.S.C. 102(e) as being allegedly anticipated by US 2003/0009638 (Sharma *et al.*). Applicant traverses.

Claim 1 specifies a list not containing address references for lines that are shared. *Sharma et al.*, do not teach or suggest a list not containing address references for lines that are shared.

*Sharma et al.* disclose a directory. Except for one additional state, there is nothing to suggest that the directory is any different than any other directory. The difference between the list of claim 1 and a directory may be found, for example, at page 10 of the present application. The examiner cites *Sharma et al.*, paragraph [0023]. Paragraph [0023] expressly teaches the opposite of the last requirement of claim 1. Claim 1 specifies that the list does not contain address references for lines that are shared. Paragraph [0023] expressly discusses an entry for a data segment in the shared state, and such an entry is illustrated in figure 1. The examiner's remarks at the top of page 7 of the office action are expressly contradicted by paragraph [0023] and figure 1 of *Sharma et al.*

In the office action, claim 11 was rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over *Sharma et al.* in light of U.S. Patent Number 6,490,625 (*Islam et al.*). Claim 11 also specifies that the list does not contain address references for lines that are shared, so the above remarks in conjunction with claim 1 and *Sharma et al.* apply equally to claim 11. Since *Islam et al.*, is not being cited for a list not containing address references for lines that are shared, no comments regarding *Islam et al.* are necessary.

The following comments are in regard to other art made of record. US Patent Numbers 5,749,087 and 6,333,958 do not teach or suggest the elements of independent claims 1, 11, or 12.

Respectfully submitted,

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